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11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 LaJoy Watson, an individual,

14 Case No.: 2:22-cv-648

15 Plaintiff,

16 vs.
17 **Dolgen Midwest, LLC's Petition for Removal**

18 Dolgen Midwest, LLC, dba Dollar General
19 Corporation, a domestic limited-liability company;
20 Doe Individuals I-X, inclusive; and Roe Corporations
21 I-X, inclusive,

22 Defendant.

23 Dolgen Midwest, LLC petitions to remove this case to the United States District Court for
24 the District of Nevada from the Eighth Judicial District Court for the State of Nevada. This
25 petition for removal is signed per Rule 11.

26 Removal is appropriate per 28 U.S.C. § 1441 because diversity jurisdiction is present per
27 28 U.S.C. 1332. Plaintiff alleges she is a resident of Nevada.¹ Dolgen Midwest LLC is a limited
liability company. It is wholly owned by DG Strategic I, LLC, a Tennessee entity. DG Strategic
I, LLC's sole member is Dollar General Corporation, a Tennessee entity with its principal place of
business in Tennessee.

28 Plaintiff alleges injury from an incident that occurred on November 29, 2021.² As to the
amount in controversy, on April 19, 2022 Plaintiff filed a motion in state court to exempt her case

1 ECF No. 1-2 at ¶ 1.

2 *Id.* at ¶ 8.

1 from a program intended for cases where the amount in controversy is \$50,000 or less. Plaintiff
2 asserted exemption was warranted because Plaintiff has medical bills that exceed \$285,763.49.³

3 Dollar General timely petitioned for removal within 30 days of notice of the facts
4 supporting removal.

5 DATED this 20th day of April, 2022.



8
9 BY: /s/ Michael Lowry
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28 _____
29 ³ ECF No. 1-5 at 2.

Certificate of Service

Pursuant to NRCP 5, on April 20, 2022 I served **Dolgen Midwest, LLC's Petition for Removal** as follows:

by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;

via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;

THE POWELL LAW FIRM
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BY: /s/ Michael Lowry